

TS:PEN  
F.#2006RO0508

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
- - - - - X

UNITED STATES OF AMERICA

- against -

LEONID ROYTMAN,

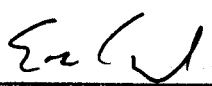
Defendants.

- - - - - X  
THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

In or about and between December 2004 and March 24, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID ROYTMAN, together with others, knowingly and intentionally conspired to travel in interstate and foreign commerce, with intent that the murder of John Doe #1 and John Doe #2 be committed, in violation of Section 125.25(1) of the New York Penal Law, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(Title 18, United States Code, Sections 1958 and 3551  
et seq.)

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK